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Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

RACHEL MEHR, *et al.*,

Plaintiffs,

v.

FÉDÉRATION INTERNATIONALE DE
FOOTBALL ASSOCIATION, *et al.*,

Defendants.

No. 4:14-cv-03879-PJH

DECLARATION OF JON T. KING IN
SUPPORT OF PLAINTIFFS' MOTION
FOR LEAVE TO FILE NEWLY
RELEASED FEDERAL
GOVERNMENTAL MATERIAL
REGARDING DEFENDANT
FÉDÉRATION INTERNATIONALE DE
FOOTBALL ASSOCIATION ("FIFA")
AND ITS PENDING MOTION TO
DISMISS ON JURISDICTIONAL AND
OTHER GROUNDS

CLASS ACTION

1 I, Jon T. King, declare as follows:

2 I am an attorney duly admitted to practice before this Court. I am an attorney with the firm of
3 Hagens Berman Sobol & Shapiro, LLP (“Hagens Berman”), attorneys of record for the Plaintiffs.

4 1. I am personally familiar with the facts set forth in this declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 2. I submit this declaration in support of Plaintiffs’ Motion for Leave to File Newly
7 Released Federal Governmental Material Regarding Defendant Fédération Internationale de Football
8 Association (“FIFA”) and its Pending Motion to Dismiss on Jurisdictional and Other Grounds.

9 3. On June 1, 2015, I wrote to FIFA defense counsel Christopher Boehning, and inquired
10 whether FIFA would consent to Plaintiffs’ requested relief. One June 2, 2015, Mr. Boehning wrote
11 back, indicating that FIFA declined to consent.

12 4. Attached hereto are true and correct copies of the following exhibits:

13 Exhibit 1: *The Guardian* article entitled, “Fifa’s secretary general Jerome Valcke under
14 new pressure over \$10m ‘bribe,’” downloaded from *The Guardian’s* website
June 2, 2015;

15 Exhibit 2: FIFA press release entitled, “FIFA President to lay down his mandate at
16 extraordinary elective Congress,” dated June 2, 2015, and a document entitled,
17 “Remarks by FIFA President Blatter”;

18 Exhibit 3: E-mail string between Plaintiffs’ counsel Jon King and Defendant’s counsel
Christopher Boehning, from June 1, 2015 to June 2, 2015;

19 Exhibit 4: Indictment, *United States of America v. Webb, et al.*, No. 15-cr-0252
20 (RJD)(RML) (E.D.N.Y.), filed May 20, 2015;

21 Exhibit 5: Department of Justice press release dated May 27, 2015, entitled, “Nine FIFA
22 Officials and Five Corporate Executives Indicted for Racketeering Conspiracy
and Corruption”;

23 Exhibit 6: Department of Justice press release dated May 27, 2015, entitled, “Attorney
24 General Loretta E. Lynch Delivers Remarks at Press Conference Announcing
Charges Against Nine FIFA Officials and Five Corporate Executives”;

25 Exhibit 7: *New York Times* article dated May 26, 2015, entitled, “FIFA Officials Arrested
26 on Corruption Charges; Blatter Isn’t Among Them”; and

27 Exhibit 8: Information, *United States of America v. Charles Blazer*, Cr. No. 13-602
28 (RDJ) (E.D.N.Y.), filed November 25, 2013.

1
2 I declare under penalty of perjury under the laws of the United States of America that the
3 foregoing is true and correct. Executed this 2nd day of June, 2015 at Berkeley, California.

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5 By: /s/ Jon T. King
6 JON T. KING
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